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July 9, 2021

VIA ECF

Hon. Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Mark McKinley v. City of New York, et al.,
20 Civ. 3606 (KPF)

Your Honor:

I am the Assistant Corporation Counsel assigned to represent defendants in the above-referenced matter. The undersigned respectfully writes herein to apprise the Court that plaintiff is seeking a two-week enlargement of time to submit the parties' joint proposed case management plan. Defendants do not object to plaintiff's request.

By way of background, on April 6, 2021, the parties convened for an initial pre-trial conference before Your Honor. At the conclusion of the conference, Your Honor instructed the parties to submit a joint proposed case management plan by July 12, 2021. On July 8, 2021, the undersigned contacted plaintiff to conduct a Rule 26(f) conference and discuss the parties' upcoming proposed case management plan. At the conclusion of the phone call, the parties arrived at an agreement as to each of the discovery deadlines and other items described in Your Honor's fillable online case management plan form. Subsequently, on July 9, 2021, plaintiff contacted the undersigned and indicated he is seeking a two-week enlargement of the parties' deadline to propose their case management plan, from July 12, 2021 to July 26, 2021. Upon information and belief, the basis for plaintiff's request is that plaintiff is in the process of retaining legal representation in this matter.

Accordingly, and due to the likelihood that plaintiff's request for an enlargement would not be received and docketed before the parties' July 12th deadline, the undersigned agreed, as a courtesy to plaintiff, to write herein to advise the Court of plaintiff's request, and to further note that defendants do not object to the relief sought.

The undersigned thanks the Court for its time and attention to this matter.

Respectfully submitted,

Andrew B. Spears /s

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cc: **VIA U.S. MAIL**
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